

July 1, 2019

Program Manager

US Army Corps of Engineers

645 G Street, Suite 100-921

Anchorage, AK 99501

Re: Pebble Mine Draft Environmental Impact Statement

Dear Sir or Madam:

This letter serves as my personal comment on the Pebble Mine Draft Environmental Impact Statement (DEIS) released by the U.S. Army Corps of Engineers (USACE) for public comment on March 1, 2019.

I'll provide my educational and professional training to provide context for my comments. My first job in life was working on my family's commercial setnet operation in Bristol Bay. We fished south of South Naknek during my formative years. I earned a Bachelor of Arts in Environmental Studies and Politics with a focus on resource management prior to working at a sport fishing lodge in the Bristol Bay area.

The experience working on wild salmon rivers in the watershed motivated a career in fishery science with the Alaska Department of Fish and Game. A subsequent Masters of Fisheries Science from the University of Alaska Fairbanks led to a career in salmon genetics. I have served as a fisheries geneticist working with Bristol Bay sockeye salmon for the past 11 years and have become an expert in the population genetic structure and relative abundance of sockeye salmon populations in the watershed.

The proposed Pebble Mine is one of the largest development projects proposed in recent Alaska history, and certainly one that presents the greatest threat to salmon in modern history. As such I am greatly dismayed by the lack of scientific rigor exhibited in the DEIS, and I encourage the USACE to accept the large responsibility the organization holds of ensuring that the best available science is taken into account throughout the review process for this project.

To begin with, I find the proposed scope and scale of the project to be disingenuous. Analysis by industry experts show that the proposed plan would not be profitable, suggesting the proponents intend to develop a much larger mine not currently being considered for permitting by regulatory agencies such as USACE¹. It would be irresponsible for the permitting agency to not consider a larger mine plan.

The diversity of sockeye salmon is one reason the Bristol Bay salmon fishery is one of the largest in the world. Work done by the Alaska Department of Fish and Game has

¹ [HYPERLINK "<https://www.nrdc.org/sites/default/files/mccoy-pebble-mine-economics-letter-20190328.pdf>"]

shown that contributions from the nine major drainages in Bristol Bay vary among years², supporting less variable harvests among years and a more consistently profitable and ecologically stable fishery. The effect of this population and life history diversity among populations has been termed the portfolio effect³. Furthermore, work done by University of Washington scientists has shown that sockeye salmon have developed highly specific genetic adaptations to the diverse habitats that they spawn in, resulting in adaptively important genes exhibited differentially throughout Bristol Bay and across Alaska⁴.

The removal of specific spawning habitats by direct mining impacts, potential for large scale habitat destruction from a potential tailings disaster, and associated pollution and habitat loss from planned transportation corridors all erode this diversity that supports long-term resilience and sustainability of the fishery resources in the Bristol Bay watershed.

Lastly, I disagree with USACE that public comments lack merit if they do not provide new information. While I agree that robust regulatory review should be based upon best available science, I also think that the opinions of local Alaskans, who face greater threat of potential disaster than other Americans, should also factor into the permitting process. As a First Alaskan and descendent of St. Lawrence Island Yupik ancestors, I believe that my indigenous perspective should be considered in the decision to permit such an impactful project. Where has the meaningful tribal consultation surrounding this project been? As a former commercial fisherman, relative and friend to many current commercial fishermen, and knowledgeable fishery scientist who works with the fishery on a near daily basis, I believe that my informed perspective should be considered in the decision to permit such a potentially disastrous project.

Thank you for your consideration. If you have any questions or I can provide any other information, please feel free to contact me.

Sincerely,

Tyler Dann

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² [[HYPERLINK "http://www.adfg.alaska.gov/index.cfm?adfg=fishinggeneconservationlab.bbaysockeye_baseline"](http://www.adfg.alaska.gov/index.cfm?adfg=fishinggeneconservationlab.bbaysockeye_baseline)]

³ [[HYPERLINK "https://www.nature.com/articles/nature09060"](https://www.nature.com/articles/nature09060)]

⁴ [[HYPERLINK "https://onlinelibrary.wiley.com/doi/abs/10.1111/mec.15082"](https://onlinelibrary.wiley.com/doi/abs/10.1111/mec.15082)]